

Federal Defenders
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May 5, 2023

Via Email and ECF

Hon. Richard M. Berman
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, NY 10001

Re: *United States v. Robert Hadden*, 20 Cr. 468 (RMB)

Dear Judge Berman,

The defense, with the consent of the government and U.S. Probation, respectfully asks for a second adjournment of sentencing. The defense psychosexual expert (Dr. Alexander Bardey) has completed the testing and interview portions of Mr. Hadden's evaluation, but is awaiting additional records and information that are necessary to his completion of the evaluation. So that Probation may receive Dr. Bardey's evaluation and take account of it in the final PreSentence Report, and so that counsel may similarly take account of the evaluation in our sentencing submissions, we ask that the Court adjourn the disclosure date for the final PSR to July 10, 2023, and schedule the sentencing for a date in August 2023. Counsel for the defense and the government are available for the sentencing the week of August 7, if that is convenient to the Court.

Thank you for your consideration of this request.

Respectfully Submitted,

_____/s/_____
Deirdre D. von Dornum
Michael D. Weil
Kathryn Wozencroft
Counsel for Robert Hadden

cc: Counsel of Record (by ECF)
U.S. Probation Officer Ashley Geiser (by E-mail)
Robert Hadden (by U.S. Mail)